

FILED

NOV 14 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND**RECEIVED**

NOV 13 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLANDUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff

vs

THEODORE N. YOUNGQUIST,

Defendant

No. CR 98-40037-01 C&W

STIPULATION AND {PROPOSED}
ORDER TO CONTINUE HEARING

THEODORE N. YOUNGQUIST is scheduled to appear before the Honorable Claudia Wilken, United States District Court Judge, on November 19, 2007, at 2:00 p.m. for hearing on a petition to revoke supervised release. The parties, by their respective counsel, HARRY C. SINGER on behalf of Mr. Youngquist, and BRIAN J. STRETCH on behalf of the United States, hereby stipulate and agree that the hearing be continued to December 17th, 2007, at

1 2:00 p.m., and that the time between November 19, 2007, and December 17, 2007, be excluded
2 under the Speedy Trial Act for effective preparation of counsel.

3 Over the course of the last several months the parties have continued to investigate the
4 case and exchange discovery materials. At the present time we are unable to resolve the matter
5 without the necessity of a Court hearing.
6

7 Counsel for Mr. Youngquist needs additional time in order to subpoena witnesses and
8 documents necessary for the presentment of an adequate defense. It is anticipated that this can
9 be accomplished by mid December 2007. Counsel for Mr. Youngquist has discussed this
10 matter with the temporary calendar clerk, Lisa Clark, for Judge Wilken and she has suggested
11 the available Court date of December 17, 2007, at 2:00 p.m.
12

13 THEREFORE, it is respectfully suggested and agreed to by the parties, that the hearing
14 date be continued from November 19, 2007, to December 17, 2007, at 2:00 o'clock p.m.

15 The United States Probation Officer, Marlana R. Peter, has been advised of the
16 proposed date and has no objection. Mr. Youngquist agrees to this continuance and waives
17 time until that date.
18


19 Respectfully submitted,

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21
22 DATED: November 9 2007

UNITED STATES ATTORNEY


BRIAN JOSEPH STRETCH
Assistant United States Attorney

23
24
25 DATED: November 9 2007


HARRY C. SINGER
Attorney for Defendant
Theodore N. Youngquist

1
2 BASED UPON STIPULATION OF THE PARTIES, AND GOOD CAUSE SHOWN,
3 the Court finds that in light of the need for effective preparation of counsel, the matter is
4 continued from November 19, 2007, to December 17, 2007, at 2:00 p.m. for revocation hearing
5 and that the time period be excluded from the Speedy Trial Act computation.
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7 IT IS SO ORDERED.
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9 DATED: November 14 2007


10 CLAUDIA WILKEN
11 United States District Court Judge
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